

WISHA REGIONAL DIRECTIVE DRAFT

WISHA Services

Department of Labor and Industries

18.40 ELECTRICAL WORK & CONFINED SPACE UNDER WAC 296-45 & 296-62 DRAFT DATE: September 2, 2002

I. Background

In March of 1995, the state of Washington adopted a revised standard for confined space hazards, WAC 296-62-141 (commonly known as Part M of 296-62 WAC) which substantially changed the definition of confined space. The revised standard also made other significant changes, including the addition of a new requirement for permits on certain confined spaces where hazards could not be eliminated.

Chapter 296-45 WAC (Safety Standards -- Electrical Workers) also contains some specific enclosed space practices in WAC 296-45-205 for the coverage of electrical construction work with regard to power distribution and transmission. In several areas this standard exceeds the general standard or includes special provisions.

II. Scope

This WISHA Regional Directive, which remains in effect indefinitely, provides guidance to WISHA consultation and compliance staff in the appropriate application of Chapter 296-45 WAC and Chapter 296-62 WAC, Part M (including certain situations where the requirements of Chapter 296-45 WAC differ from -- and therefore supersede -- those of Chapter 296-62 WAC, Part M). This WRD replaces, but does not substantively change, the previous WRD 18.40.

III. Application Guidance

Inspectors and consultants must cite code violations of Chapter 296-45 WAC and Chapter 296-62 WAC, Part M, in reference to all confined space hazards, applying the standard appropriate to the hazard being cited.

A. What are the requirements for underground and underground residential distribution electrical work?

WAC 296-45-205(6) makes it clear that all provisions of WAC 296-62, Part M apply whenever employees enter an enclosed space while it contains a hazardous atmosphere. For such spaces, any violations must be cited using the specific provisions in WAC 296-62, Part M.

For other spaces where a hazard may exist, WAC 296-45-205(7) requires that for underground and underground residential distribution electrical work an attendant

("watchman") shall be kept at the surface. For such spaces, WISHA staff must cite violations for the lack of an attendant or for a failure to ensure that the attendant performs properly using WAC 296-45-205(7). Violations related to attendant duties can be supplemented by reference to the attendant duties in Chapter 296-62, Part M, but the requirements of Chapter 296-45 must provide the basis for the citation.

B. What are the requirements while work is performed on energized wires, cables, or appliances?

WAC 296-45-65037(10) and WAC 296-45-65038(4)(a) require two or more competent or qualified persons to be in the same manhole or subway while performing work on any energized wire, electrical cable or electrical appliance carrying more than 300 volts of electricity for underground and underground residential distribution.

C. How should confined space requirements be applied to electrical workers where electrical hazards are present?

Employers should be encouraged to eliminate all safety and health hazards for their confined space work. However, at times the electrical systems will be energized in the confined space due to the requirements of the electrical work in question.

- a. WISHA staff must not issue violations of Chapter 296-62 WAC, Part M, for the failure of electrical lockout-tagout during electrical work by the electrical contractor or utility. However, the appropriate violation under Chapter 296-62 WAC, Part M, must be issued for any other safety and health hazards not eliminated or otherwise controlled so as to not pose a hazard to the electrical workers.
- b. Such confined space situations are permit-required confined space entries and alternative entry provisions of WAC 296-62-14110(7) cannot be used.

D. Are employers subject to Chapter 296-45 WAC required to use forced ventilation and atmospheric testing when working underground?

Chapter 296-45-205(9) WAC allows forced ventilation *or* atmospheric testing prior to entry into underground manholes or unvented vaults and during entry work.

Therefore, WISHA staff must not cite violations of Chapter 296-62 WAC, Part M, for a failure to perform both tasks.

Approved: _____

Michael Wood

Senior Program Manager, WISHA Policy & Technical Services

For further information about this or other WISHA Regional Directives, you may contact WISHA Policy & Technical Services at P.O. Box 44648, Olympia, WA 98504-4648 or by telephone at (360)902-5503. You also may review policy information on the WISHA Website (<http://www.wa.gov/lni/wisha>).